## UNITED STATES DISTRICT COURT DISTRICT OF MARYLAND

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Gail Lynett Bloodworth	•	Case Number:	03-53447	
Debtor	: :	(Chapter 7)		
Marylin Pierre	:	Adversary Proceedin	g Number:	
600 South Frederick Avenue	:			
Suite 303	:			
Gaithersburg, MD 20877-1245	:			
Plaintiff	•			
V.	•			
	•			
Gail Lynett Bloodworth	•			
P.O. Box 3635	•			
Laurel, MD 20707	:			
	:			

## COMPLAINT TO DETERMINE DISCHARGEABILITY OF DEBT AND FOR ENTRY OF JUDGMENT

The Complaint of Marylin Pierre, hereinafter referred to as Plaintiff, respectfully represents as follows:

- 1. Jurisdiction is based on 28 U.S.C. § 1334, 28 U.S.C. §157, 11 U.S.C §523(a).
- 2. On March 4, 2003, Gail Lynett Bloodworth, hereinafter referred to as Debtor, filed a Chapter 13 bankruptcy and converted to a case under Chapter 7 on October 2, 2003.
- 3. That on June 4, 2002, Plaintiff sent an invoice for \$4,771.40 to Debtor for services rendered in representing her in a divorce, alimony, child support, child custody, and property issue matter.
- 4. That the amount owed to Plaintiff is not dischargeable because it is for services rendered in a divorce, alimony, child support, child custody, and property issue proceeding.

WHEREFORE, Marylin Pierre requests that this Court:

- 1. Enter a judgment in favor of Marylin Pierre against Gail Lynett Bloodworth for \$4,771.40 plus interests and costs;
- 2. Determine that the Debtor's Debt to Marylin Pierre as evidence by the judgment is not dischargeable; and
  - 3. Grant Marylin Pierre such other and further relief as may be necessary.

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/s/ Marylin Pierre Marylin Pierre, Plaintiff Bar Number: 10075 600 South Frederick Avenue, Suite 303 Gaithersburg, MD 20877-1245 (301) 417-6900